

Intercontinental Terminals Company (ITC) Fire Update Deer Park, Texas May 20, 2019 00:00 - May 26, 2019 23:59

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recover off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminals Company (ITC), LLC facility in Deer Park Texas. The impacted ITC facility tank farm consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to the drainage pathway. Firefighting water and foam potentially containing tank products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the north side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). ITC rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

As a result of the fire, nine of the fifteen oil tanks had been burned and collapsed. One of the tanks had been burned and damaged, but not completely collapsed. Two tanks had become overheated and smoked but were not significantly damaged. Four of the tanks had smoked but did not burn. It is possible that all fifteen tanks were impacted to varying extent by the incident.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 parts per million (ppm) were detected (highest was 16.5 near National Tank Services) by the various entities conducting air monitoring.

EPA created the EPA website response.epa.gov/ITCTankFire on March 17, 2019 and began sharing information with the public. EPA and the Texas Commission on Environmental Quality (TCEQ) posted the Story Map Resource Interactive tool for the ITC incident. The Story Map provides easy access for EPA and TCEQ incident data.

Executive Overview:

- During the week of May 20, 2019, ITC continued to discharge from their wastewater treatment plant. The flow rate was increased to 100 gallons per minute on May 21, 2019.
- On May 20, 2019, EPA notified ITC that Delta Water Processing was on the list of acceptable facilities to receive waste from a CERCLA facility after consult with TCEQ and no compliance issues were identified. The notification indicated that Delta Water Processing was acceptable to receive 25,000 barrels of non-hazardous waste water contained in barge K28117.
- During week of May 20, 2019, ITC continued the deconstruction of tank 80-14 (pygas) and continued staging scrap metal on the tank 80-15 floor that remains in place for this purpose. Rinsate samples were collected from the metal scrap piles of 80-15 and 80-14. Scrap metal with rinsate sample concentrations less than the TCEQ Texas Risk Reduction Program (TRRP) protective concentration levels (PCLs) for groundwater, was taken offsite to Cameron Recycling.
- On May 21, 2019, based on recent monitoring data and ongoing Site activities, EPA demobilized TAGA and decreased EPA's participation is handheld air monitoring activities. ITC will continue air monitoring at current resource levels.
- On May 21, 2019, it was determined that the facility ITC planned to dispose of the waste from water recovery operations (Southwest Shipyards) was not authorized by TCEQ permit to receive and treat the incident related hazardous waste. OSC Adam Adams communicated that no additional incident hazardous waste liquids be transported to the facility, until the permitting issue is resolved.
- On May 22, 2019, ITC, EPA, TCEQ, and Southwest Shipyards began discussions to resolve the permit of Southwest Shipyards TPDES Permit No. WQ0002605000.
- On May 25, 2019, deconstruction began on tank 80-13 (toluene).

Land Operations:

The table will reflect the most recent status during the tank deconstruction process:

Tank Status	Tank No.	
Complete & Clean – No further action (NFA) needed	80-1, 80-4, 80-9, 80-11, 80-12	
Complete – NFA possible until deconstruction begins	80-2, 80-3, 80-5, 80-6, 80-7, 80-8, 80-10	

Ongoing Deconstruction Operations	80-13
Complete – NFA following Deconstruction	80-15, 80-14

Water Operations:

- All water recovery operations have ceased, with patrol and monitoring on-going.
- As of May 20, 2019, the Unified Command (UC) has signed out all shoreline segments except Tucker Bayou (B14b), which will be addressed by long term remediation with planned oversight by TCEQ. SCAT has no plans to inspect Tucker Bayou (shoreline segment B14a) until tasked by UC.
- As of May 26, 2019, all deconned equipment has been removed from the decon area.

Division	Total Shoreline Length (mi)	Total Length of Shoreline Meeting SCAT End Points or	Total Length of Shoreline with UC Sign- off (mi)
		Assigned NFT*	· · · · · · · · ·
Α	10.25	10.25	10.25
В	7.82	6.95	6.95
С	27.84	27.84	27.84
D	17.82	17.82	17.82
South & East of D	23.22	23.22	23.22
Total	86.95	86.08	86.08

- As of May 26, 2019:
 - o 2,175 feet of boom currently deployed (not the total length of boom)
 - o 278,756 bbl of contaminated liquids recovered from tank farm operations
 - o 223,882 bbl of oil water mixture recovered from water recovery operations
 - As reported on May 24, 2019, total volume of incident related impact liquids is 837,286 bbl. This includes volumes in barges and tanks and stormwater from the 2nd 80's tank farm.

Total Vessels as of May 26, 2019				
Work	Barges	Small Capacity	Skimmers	Total
Boats		Skimming Vessels		Vessels
1	5	0	0	6

Community Air Monitoring:

- EPA, TCEQ, and ITC continued to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility until the morning of May 21, 2019. TCEQ and ITC continue their air monitoring efforts.
- EPA conducted handheld air monitoring from May 20, 2019 at 00:00 to May 21, 2019 at 07:00 at 85 locations in the communities. Results were reported above the detection limit at 3 locations for total volatile organic compounds (VOCs) adjacent to the ITC facility.
- EPA conducted air sampling using the TAGA on May 20, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term

AMCV for benzene, toluene or xylene. This information has been shared with UC. The TAGA was demobilized on May 21, 2019.

Next week's operations:

- No deconstruction activities will be conducted on May 27, 2019 in observance of Memorial Day. ITC will maintain a small crew of CTEH air monitors and the tank farm will continue to be monitored with 24-hour security.
- ITC will continue the tank deconstruction process. ITC will continue to conduct air
 monitoring both during the day and night, around the tank farm, in adjoining industrial
 areas, and communities downwind from the facility. ITC will send daily reports that
 convey ongoing site operations and waste management to EPA and TCEQ.
- EPA and TCEQ will continue to evaluate plans for transition from the emergency response phase to the remediation phase with oversight being provided by TCEQ.

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC Deer Park facility, federal, state and local agencies joined ITC in a Unified Command response. Multiple agencies including the United States Coast Guard, TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources (as of Thursday, May 23, 2019):

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	2	1	3
EPA Non-Region 6	0	1	1
START	1	4	5
Other Contractors	0	3	3
Total	3	9	12

EPA OSC and START demobilized at the end of the day on May 23, 2019. EPA presence onsite will be based on site conditions and needs, at the discretion of the EPA OSC.